

1 find out the facts and what's going on in it.

2 Q Did you have any obligation to talk to
3 other detectives who authored reports for that
4 particular investigation?

5 A I wouldn't say an obligation but
6 occasionally. You may have to ask another
7 detective what about this, what evidence --
8 usually in the report it's self-explanatory.

9 Q Okay. Do you recall any policies or
10 GPOs directed to this process of presenting a case
11 to a prosecutor?

12 A I don't.

13 MR. CALDERONE: Objection to form of the
14 question, but you can answer.

15 A I don't have any recollection of
16 anything like that, ma'am.

17 Q Do you recall any training specifically
18 on this topic?

19 A The only training I would have received
20 would be from the other experienced detectives to
21 see what they -- how they would have proceeded on
22 a certain case, and I would learn from them.

23 Q All right. Do you recall during the
24 course of your career any policies or GPOs
25 directed toward detectives' duties with respect to

1 **the disclosure of exculpatory evidence?**

2 MR. CALDERONE: Objection. You can
3 answer.

4 A I do not recall any specific training
5 other than what I knew from talking with other
6 veteran detectives and even prosecutors I learned
7 that you don't hold nothing back. And then we
8 didn't. We would turn everything over to the
9 prosecutor.

10 Q Do you recall any policies or GPOs
11 directed to that topic that you were made aware of
12 at any point?

13 A I do not recall any specific GPOs or --
14 no.

15 Q Do you recall any policies or GPOs
16 concerning the disclosure of alternate suspect
17 evidence? Did you answer? Sorry.

18 MR. CALDERONE: I'm sorry, you can
19 answer.

20 A That's what I was waiting for. I'm
21 sorry.

22 MR. CALDERONE: He's not going to
23 answer.

24 A No.

25 MR. CALDERONE: Objection. You can

1 answer.

2 A I do not recall any specific GPOs or
3 orders. There may have been. I don't recall
4 them.

5 Q Do you recall any specific training on
6 that topic?

7 MR. CALDERONE: Objection. Asked and
8 answered. You can answer again.

9 A The only specific training like I have
10 said many, many times, ma'am, and it's the same
11 thing is from the veteran detectives, they taught
12 me from their knowledge of going to court many,
13 many, many times and making reports, doing things.

14 Q Do you recall any specific training on
15 the disclosure of exculpatory witness statements?

16 MR. CALDERONE: Objection. Asked and
17 answered. You can answer again.

18 MS. GREENE: Ken, I haven't asked this
19 question before.

20 MR. CALDERONE: I beg to differ. You
21 asked this question five times.

22 Q All right. Go ahead.

23 MR. CALDERONE: The record will speak
24 for itself, though. Go ahead, you can answer
25 again.